



Transmission Business Line (TBL)

BPAT'S Response to Comments from PNGC on BPAT's Business Practice Revision 1 Draft Posted April 09, 2003

ENERGY IMBALANCE SERVICE

Posted: May 5, 2003

PNGC provides the following comments on the proposed revision to the Energy Imbalance business practice as posted on the TBL business practices website at <http://www.transmission.bpa.gov/oasis/bpat/BusPractices/forum/messageview.cfm?catid=9&threadid=61>. The BPAT response follows the customer comment.

Customer Comment

Mary Ann,

Per your e-mail below, PNGC Power (PNGC) appreciates the opportunity to submit comments regarding BPAT's revised Energy Imbalance Services business practice. PNGC is committed to working with BPAT or any control area towards an end that promotes a reliable power system for all parties and specifically the customers of the Northwest.

As described in Section II.B.1.(b) of the draft we fully agree with BPAT's language to assign "Strikes" to self supply customers with resources that do not respond to load variations. Although we don't necessarily agree with the use of the term "Strike", we do believe this is a serious consequence and requires this level of necessary enforcement.

In Section II.B.1(c) we believe BPA may be establishing a scheduling standard for Self Supply that may surpass their scheduling accuracies within their own organization. We recommend that BPA remove any reference in the document that allows BPAT to terminate this service for scheduling errors. We believe the level or magnitude of scheduling mistakes associated with this service, to date, have been small and have not warranted the time or effort spent on this issue by all parties involved. We believe the cost of the fix has surpassed the potential impact of the problem. We would support BPAT including language in the business practices that requires all parties to use "reasonable efforts" to minimize scheduling errors between the parties including BPAT, BPAP and customer.

We know this has been a challenging issue and we sincerely appreciate your efforts in attempting to bring this issue towards conclusion.

BPAT Response

It is BPAT's goal to eliminate any scheduling inaccuracies within its organization and it believes that once BPAT has fully automated its scheduling practices, errors will be minimal.

The purpose of Energy Imbalance is to encourage Transmission Customers to schedule accurately as well as ensure that the Control Area maintains load-resource balance. BPAT has the responsibility to ensure system reliability. If entities with load or generation in the BPA Control Area do not schedule accurately and reliably, the Control Area incurs extra costs to maintain reserves available to meet the scheduling error. If a customer demonstrates an inability to schedule accurately pursuant to the criteria for Self-Supply of Energy Imbalance Services business practice causing an imbalance to the Federal System, BPAT reserves the right to terminate self-provisions of Energy Imbalance Services

Beginning January 1, 2003, BPAT has been performing the Energy Imbalance calculation from BPAT's Renaissance calculator based upon information collected 72 hours from the day by which the Energy Imbalance was scheduled and providing this information to the self-supply customer. This service has greatly reduced the level of errors associated with the tracking of energy and capacity with BPAT and BPAP.

In addition, BPAT has included in its Energy Imbalance Services business practice mechanisms to waive a strike based on certain conditions resulting in scheduling errors by the customer. See section II.B.3 and 5 of the Energy Imbalance Services business practice.

Thank you for your comments. BPAT looks forward to working with you to continue improving this service.